

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BILLY R. WILLIAMS,	:	
	:	
Plaintiff,	:	Civil Action No. 03-239E
	:	
vs.	:	Hon. Maurice B. Cohill, Jr.
	:	
	:	
PENNSYLVANIA STATE POLICE, AN	:	
AGENCY OF THE COMMONWEALTH	:	
OF PENNSYLVANIA,	:	
	:	Electronically Filed
Defendant.	:	

REVISED PRE-TRIAL STIPULATION

- I. The parties stipulate that the following facts will require no proof at trial:
1. The northwestern portion of Pennsylvania is designated by the PSP as Area IV, which is comprised of Troop C (Punxsatawney), Troop D (Butler) and Troop E (Erie).
 2. Plaintiff began his employment with the Pennsylvania State Police ("PSP") on or about May 22, 1969, when he was admitted to the Pennsylvania State Police Academy as a cadet.
 3. Upon Plaintiff's graduation from the academy on August 14, 1969, Plaintiff was assigned to the patrol section of Troop D in Butler, Butler County, Pennsylvania as a Trooper.
 4. Each Troop of the PSP is divided into three sections: staff, crime, and patrol.
 5. In May 1970, Plaintiff was transferred to Troop S in Meadville, Crawford County, Pennsylvania as a Trooper in the patrol section.
 6. In or about 1981, Plaintiff was transferred to the PSP troop in DuBois, Clearfield County, Pennsylvania.
 7. After a brief period of time in DuBois, Plaintiff was promoted to Patrol Corporal at a PSP Troop in Lock Haven, Clinton County, Pennsylvania.

8. After six months in Lock Haven, Plaintiff was transferred to a Patrol Corporal position at Troop E in Erie County. In January 1984, Plaintiff was promoted to Sergeant and assigned to Troop E Headquarters as a Patrol Sergeant in the Patrol Section.
9. In or about January 1985, Plaintiff applied for and received a Staff Sergeant position at Troop E Headquarters.
10. In or about May 1990, Plaintiff was promoted to the position of Staff Lieutenant at Troop M in Bethlehem, Northampton County, Pennsylvania.
11. In February 1992, Plaintiff was transferred, at his request, to Troop D in Butler, where he was made Station Commander of the New Castle Station.
12. In early 1993, Plaintiff was transferred to the Station Commander position of the Mercer Station of Troop D. This transfer was made at Plaintiff's request.
13. On or about September 11, 2000, Plaintiff was transferred to Troop D Headquarters in Butler where he was assigned as Special Projects Officer.
14. On January 20, 2001, Plaintiff was transferred to Troop E (Erie) Headquarters where he was assigned the position of Staff Lieutenant.
- 15-1. By written memorandum dated October 13, 2001, Williams requested a personal meeting with the Commissioner of the PSP, who at the time was Colonel Paul J. Evanko, a white male. Williams sent this memorandum through his chain of command. On October 16, 2001, Williams' supervisor, Captain Conley, forwarded Williams' request for a meeting with the Commissioner through channels to his supervisor, Major Seilhamer. Major Seilhamer forwarded the request to the Commissioner's office and was subsequently informed that the request for a personal meeting was denied. On November 1, 2001, Williams was notified by memorandum from Major Seilhamer that his request to have a personal meeting with the Commissioner had been denied.
- 15-2. By a three-page written memorandum dated January 29, 2003, Williams again requested a personal meeting with the Commissioner of the PSP, who at the time was

Colonel Jeffrey B. Miller, a white male. Williams also sent this memorandum through his chain of command. On February 3, 2003, Captain Conley, Williams' then supervisor, forwarded Williams' request for a meeting with the Commissioner through channels to his supervisor, Major Seilhamer. Major Seilhamer forwarded Williams' request to the PSP's Deputy Commissioner for Operations, Lt. Colonel Ralph Periandi, on February 6, 2003. Thereafter, by memorandum dated March 27, 2003, Williams was informed that the Commissioner had reviewed Williams' written correspondence and that Williams' request to meet personally with the Commissioner was denied.

Respectfully submitted,

Date: December 6, 2007

/s/Neal A. Sanders
Neal A. Sanders, Esquire
PA ID NO. 54618
Co-Counsel for Plaintiff,
Billy R. Williams

/s/Scott A. Bradley
Scott A. Bradley
Senior Deputy Attorney General
Attorney I.D. No. 44627
Attorney for Defendant

/s/Dirk D. Beuth
Dirk D. Beuth, Esquire
PA ID NO. 76036
Co-Counsel for Plaintiff,
Billy R. Williams

OFFICE OF ATTORNEY GENERAL
6th Floor, Manor Complex
564 Forbes Avenue
Pittsburgh, PA 15219
(412) 565-3586

LAW OFFICES OF NEAL A. SANDERS
1924 North Main Street Extension
Butler, PA 16001
(724) 282-7771